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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the Commission's)	
Own Motion into the Service Quality Standards for)	Rulemaking 02-12-004
All Telecommunications Carriers and Revisions to)	(Filed December 5, 2002)
General Order 133-B)	
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**REPLY COMMENTS OF VERIZON CALIFORNIA INC. (U 1002 C)
AND ITS CERTIFICATED CALIFORNIA AFFILIATES
ON MARCH 30, 2007 ASSIGNED COMMISSIONER RULING AND SCOPING MEMO**

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Pursuant to the March 30, 2007 Assigned Commissioner's Ruling and Scoping Memo, Verizon California Inc. submits these Reply Comments on behalf of itself and its certificated California affiliates (collectively "Verizon").¹ Accompanying these comments are the supporting Reply Declarations of Dr. Debra J. Aron and Mr. Michael M. Fernandez.

I. INTRODUCTION

Most parties agree that the time has come to fundamentally reassess the Commission's role with respect to service quality given the realities of today's competitive communications market. AT&T, for example, agrees with Verizon that monopoly-era, wireline-specific standards such as G.O. 133-B should be eliminated:

In a competitive market ... "overly stringent quality standards can preclude customers from purchasing the price-quality combination they value most."²

Joint Commenters agree that attempting to update or extend such obsolete standards to intermodal competitors is an exercise whose costs would far exceed the benefits:

[T]he selection by the Commission of a given metric, or group of metrics, could lead to unintended consequences as carriers, in an effort to avoid an adverse governmental report, devote resources to manage the specific issues or metrics chosen by the Commission for emphasis, but not to other issues or metrics that may be of greater interest to consumers.³

¹ These affiliates include Bell Atlantic Communications, Inc., d/b/a Verizon Long Distance (U-5732-C), NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions (U-5658-C), MCI Communications Services, Inc., d/b/a Verizon Business Services (U-5378-C), MCI Metro Access Transmission Services, d/b/a Verizon Access Transmission Services (U-5253-C), TTI National, Inc., d/b/a Verizon Business Services (U-5403-C), Teleconnect Long Distance Services & Systems Company, d/b/a Telecom*USA (U-5152-C), Verizon California Inc. (U-1002-C), and Verizon Select Services Inc. (U-5494-C).

² OPENING COMMENTS OF PACIFIC BELL TELEPHONE COMPANY (May 14, 2007) at 6, citing previously filed COMMENTS OF DR. ROBERT G. HARRIS (Apr. 1, 2003).

³ COMMENTS OF THE JOINT COMMENTING PARTIES IN RESPONSE TO ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO (May 14, 2007) (hereafter "Joint Commenting Parties' Opening Comments") at 6-7.

Instead, Joint Commenters agree with Verizon that the Commission should avoid prescriptive service quality regulations and instead rely “on competitive market forces as a sound means of promoting high quality services for California’s consumers,”⁴ consistent with the pro-competitive principles articulated in the Scoping Memo.

Without any meaningful explanation, however, DRA and TURN disregard the Scoping Memo’s request for a technologically neutral solution that relies principally on competition over regulation.⁵ Instead, they propose to *dramatically expand* service quality regulations through new technology-specific standards, “positive” reporting requirements, and penalties for failure to comply.⁶ Their prescriptive proposals would apply *not only* to ILECs, CLECs, and NDIECs, which are currently subject to G.O. 133-B, *but also* to wireless and, possibly, VoIP providers, even though the service quality of these intermodal competitors has *never before* been regulated by this Commission for jurisdictional reasons, among others.⁷ Such a broad expansion of the Commission’s service quality role raises serious problems that DRA and TURN fail to resolve or even confront. Verizon addresses these problems below.

⁴ Joint Commenting Parties’ Opening Comments at 3.

⁵ Scoping Memo at 3.

⁶ OPENING COMMENTS OF DIVISION OF RATEPAYER ADVOCATES ON THE ASSIGNED COMMISSIONER’S RULING AND SCOPING MEMO IN THE SERVICE QUALITY OIR R.02-12-004 (MAY 14, 2007) (hereafter “DRA Opening Comments”) at 2, 4, 7, 10, 21; OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON SCOPING MEMO ISSUES (MAY 14, 2007) (hereafter “TURN Opening Comments”) at 2, 14–15, 18.

⁷ The only apparent exception is that DRA would exempt from its proposal “service providers serving fewer than 5,000 customers.” (DRA Opening Comments at 21.) Dr. Aron shows how this exception further violates the principle of competitive neutrality set forth in the Scoping Memo. (REPLY DECLARATION OF DR. DEBRA J. ARON SUPPORTING COMMENTS OF VERIZON CALIFORNIA INC. (JUNE 15, 2007) (hereafter “Aron Reply Declaration”) at ¶ 36.

II. DISCUSSION

A. **CONTRARY TO THE PRO-MARKET PRINCIPLES ARTICULATED IN THE SCOPING MEMO, TURN AND DRA PROMOTE REGULATION OVER COMPETITION TO THE DETRIMENT OF OPTIMAL, CONSUMER-DRIVEN SERVICE QUALITY.**

A threshold problem with DRA and TURN's expansive, prescriptive approach to service quality regulation is the Commission's lack of regulatory authority over VoIP, as Verizon previously discussed.⁸ DRA avoids the issue by remaining silent on whether its proposal would apply to VoIP, stating merely that it would include all providers "under [the Commission's] jurisdiction."⁹ TURN explicitly states that its wireline-specific service quality standards would apply to VoIP but fails to address the jurisdictional issue. DRA and TURN's silence speaks volumes on the Commission's lack of authority to impose service quality regulations on VoIP providers.

DRA and TURN attempt to justify their pro-regulatory approach to service quality by suggesting that *competition itself* is the problem: "TURN submits that these service quality standards are even more important and relevant today as the telecommunications market becomes more competitive."¹⁰ This mindset contradicts basic economic principles,¹¹ in addition to being fundamentally inconsistent with the Scoping Memo's pro-competitive approach. Indeed, as Dr. Aron has exhaustively demonstrated, where significant safety risks are not directly implicated, competition is superior to regulation at achieving optimal service quality for consumers.¹²

In fact, Dr. Aron's review of the economic literature shows that increasing prescriptive service quality regulations in dynamic, competitive markets is exactly the

⁸ OPENING COMMENTS OF VERIZON CALIFORNIA INC. AND ITS CERTIFICATED CALIFORNIA AFFILIATES ON MARCH 30 ASSIGNED COMMISSIONER RULING AND SCOPING MEMO (May 14, 2007) (hereafter "Verizon Opening Comments") at 8.

⁹ DRA Opening Comments at 2.

¹⁰ TURN Opening Comments at 4–5. See also generally Aron Reply Declaration at §§ IV, V, VII (discussing various erroneous assertions by DRA and TURN regarding the nature of competition and its affects on consumers).

¹¹ Aron Reply Declaration at ¶ 58 and generally at §§ IV, V, VII.

¹² See, e.g., Verizon Opening Comments at § II.A; Aron Reply Declaration at ¶ 4.

wrong approach. It harms competition, imposes unnecessary costs, stifles innovation, and limits the ability of providers to tailor their products and services based primarily on consumer demand.¹³

Regulation is a *proxy* for competition, not a *replica* of it. Rather than attempting to replicate the market, regulators should recognize that achieving market outcomes requires removing regulatory restrictions as telecommunications markets become increasingly competitive. Expanding the scope of regulation will only make it less, not more, plausible that regulators will be able to achieve market outcomes.¹⁴

Although DRA and TURN appear to believe that any consumer inconvenience is a justification for regulation, the consumer's best weapon against unsatisfactory service quality is the ability to switch to another provider. This ability endows consumers with a "credible threat" against providers, which, in turn, encourages them to provide consumers the service quality they demand. Mr. Fernandez, Verizon's statistician, confirms this point in his reply declaration. His empirical analysis of internal and external survey data overwhelmingly shows a strong relationship between customers' service experiences and their loyalty to providers:

[T]here is simply no question, from an empirical point of view, that the competitive market requires providers to ensure that their service quality meets or exceeds customers' expectations because customer loyalty decreases substantially in the wake of decreases in the service quality attributes that customers value.¹⁵

DRA and TURN's failure to appreciate the powerful service quality incentives that competition provides, or to recognize that regulation can harm those incentives, is perhaps best illustrated by TURN's call for standard installation intervals against which wireline providers would be measured.¹⁶ TURN explains that Verizon offers

¹³ Aron Reply Declaration at ¶¶ 32–33.

¹⁴ Aron Reply Declaration at ¶ 58, citing J. Gregory Sidak and Daniel F. Spulber, "Deregulation and Managed Competition in Network Industries," *Yale Journal on Regulation*, 15, 117 (Winter 1998) at p. 140 (emphasis added, footnotes omitted).

¹⁵ Fernandez Reply Declaration at ¶ 9; see also *id.* at § II.

¹⁶ TURN Opening Comments at 8.

installation service on the weekends, but does not count those days in recording the installation interval for regulatory reporting. In TURN's view, this is a "problem"¹⁷ because it interferes with the regulatory objective of measuring and monitoring service quality in a standardized manner. The fact that Verizon offers service on the weekend, however, is evidence that Verizon is vigorously responding to competition to meet the diverse needs of its customers and differentiate itself from its competitors. Only a regulatory mindset could confuse providing weekend service as a "problem" needing a regulatory solution.

B. DRA AND TURN'S PRESCRIPTIVE PROPOSALS ARE ARBITRARY AND LACK ANY ECONOMIC OR EMPIRICAL SUPPORT.

Because they rely on regulation, not competition, to drive service quality, DRA and TURN are forced to propose different standards for different technologies. Wireless and wireline standards differ, and within wireline, VoIP has different standards depending on how it is provisioned.¹⁸ While TURN acknowledges that this approach contradicts the principle of regulatory symmetry as set forth in the Scoping Memo,¹⁹ DRA attempts to reinterpret symmetry to mean that all providers should be regulated, even if they are regulated differently. This approach has several problems beyond its fundamental inconsistency with the pro-competitive, technology-neutral principles articulated in the Scoping Memo (discussed above).

The most glaring of these problems is the lack of any economic or other principled basis supporting the specific standards DRA and TURN propose. DRA vaguely claims that its preferred service quality standards are "[t]he absolute minimum measures essential for consumer health and safety."²⁰ As Dr. Aron shows,²¹ however,

¹⁷ *Id.*

¹⁸ TURN Opening Comments at 6. Even when considering only wireline carriers, TURN acknowledges that the same measures may not be appropriate. For example, calculating average installation intervals for VoIP service may not be appropriate because they do not require a physical presence by the provider. (*Id.* at 8.)

¹⁹ TURN Opening Comments at 6.

²⁰ DRA Opening Comments at 7.

²¹ Aron Reply Declaration at § VI.

DRA's standards go well beyond ensuring consumer health and safety, and nowhere does DRA explain how to distinguish between essential and non-essential standards. For instance, DRA proposes to regulate the amount of time it takes for customers to reach a live operator, claiming that "when customers need to contact the phone company, they want to be able to do so without delay, *no matter what the subject of their inquiry is.*"²² The connection to health and safety here is, at best, a stretch. Speed of answering is one of many quality characteristics, and one that involves a cost/benefit tradeoff with other attributes. DRA provides no support for its bald assertion that answer times are "of vital importance"²³ consumers, or for its implicit assumption that that customers would trade faster answering times for other benefits with a similar cost.

Indeed, as Mr. Fernandez shows, comparing and contrasting DRA and TURN's proposals illustrates the arbitrary nature of the service attributes on which each focuses.²⁴ DRA, for example, believes that monitoring trouble reports is "important in accessing network reliability," and therefore concludes that establishing a mandatory floor for incidence of trouble reports is among the "absolute minimum measures essential for consumer health and safety."²⁵ TURN, on the other hand, believes that trouble report monitoring is unnecessary and can be eliminated.²⁶

In a competitive market, however, consumers actually prefer many different combinations of price and quality, as Dr. Aron demonstrates.²⁷ In other words, the quality attributes that DRA and TURN prefer may not be the same as those that consumers prefer, and it is impossible for regulators to correctly duplicate consumers' dynamic preferences. Moreover, imposing set rules limits innovation and denies

²² DRA Opening Comments at 8 (emphasis added).

²³ DRA Opening Comments at 6.

²⁴ See Fernandez Reply Declaration at § III.

²⁵ DRA Opening Comments at 7, 9.

²⁶ TURN Opening Comments at 21.

²⁷ Aron Reply Declaration at ¶¶ 15, 23–24, 29, 33, 35, 37, 60–65.

customer choice. Even if the Commission could somehow be confident that the measures chosen today were optimal, technology changes may make them obsolete or harmful in the future. Instead of making choices for consumers by imposing arbitrary regulatory standards, providers should be free to utilize different approaches based on what they believe their customers want.

C. CALIFORNIA LAW ENCOURAGES RELIANCE ON COMPETITION TO PROMOTE REASONABLE SERVICE QUALITY LEVELS.

DRA and TURN claim that the Public Utilities Code requires the Commission to continue to regulate service quality using the same prescriptive techniques used during the monopoly era. For example, TURN argues that section 2896²⁸ requires the Commission “to promulgate service quality standards for all providers of voice services,” and DRA argues that a combination of several code sections requires the Commission to “establish standards for the minimum service quality measures.”²⁹ DRA and TURN are wrong. In fact, federal and state law and Commission precedent not only permit but encourage a policy of relying on competitive communications markets to promote reasonable service quality levels.

The Commission first recognized this core principle in 1993 when it granted the former AT&T greater regulatory flexibility. “If AT&T-C prices its services too high or if its service quality deteriorates,” the Commission held, “customers will have an incentive to switch to a lower-priced or better-quality carrier.”³⁰ The Commission continued this pro-competitive communications policy in its recent URF Phase 1 decision,³¹ citing section 709.5, which endorses a “reliance on competitive markets” as

²⁸ For example, the different answering time standards proposed by DRA and TURN would cause providers to configure their voice recognition units and center resources in different ways, with important customer satisfaction ramifications, but neither provides any evidence that its particular preference is the better approach. See Fernandez Declaration at ¶¶15–17.

²⁹ TURN Opening Comments at 3; DRA Opening Comments at 2–3.

³⁰ *In the Matter of the Application of AT&T Communications of California, Inc., for Additional Regulatory Flexibility*, D.93-02-010, 48 CPUC 2d 31 (1993), at 84.

³¹ See generally D.06-08-030 at § III.

the preferred means to achieve the state's telecommunications policy goals,³² and the Telecommunications Act of 1996, whose "overarching purpose" is to "promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers."³³

DRA and TURN, however, vaguely suggest that other Public Utilities Code sections contain language requiring the Commission to abandon its pro-competitive communications policy and instead dictate technology-specific service quality standards.³⁴ Each of the sections DRA and TURN cite, however, simply sets forth general principles that are, in fact, entirely consistent with the overarching policy of relying on competition over regulation when possible.

Section 709(h), for example, requires the Commission "to encourage fair treatment of consumers through provision of sufficient information for making informed choices, establishment of reasonable service quality standards, and establishment of processes for equitable resolution of billing and service problems." This provision does not require the Commission to prescribe particular standards, and there is no reason to conclude that reliance on competition is an inappropriate means for achieving "reasonable service quality standards." Nor is there any evidence showing that the arbitrary standards DRA and TURN propose are somehow better proxies for "reasonable" service quality than what consumers actually demand in the competitive market.³⁵

Similarly, Section 2896(c) states that the "commission shall require telephone corporations to provide customer service to telecommunications customers that includes, but is not limited to, all of the following: ... Reasonable statewide service

³² D.06-08-030, *mimeo* at 32.

³³ *Id.* at 33–34 (internal quotations omitted). See also Pub. Util. Code § 709(g) which states the following telecommunications policy goal: "To remove the barriers to open and competitive markets and promote fair product and price competition in a way that encourages greater efficiency, lower prices, and more consumer choice."

³⁴ TURN Opening Comments at 2-3 (citing § 709 and § 2896); DRA Opening Comments at 2-3 (citing § 451, § 709 and § 2896).

³⁵ Aron Reply Declaration at ¶ 15.

quality standards, including, but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing.” As with Section 709(h), it is left to the Commission to determine the best means to ensure that “telephone corporations ... provide customer service” satisfying “reasonable statewide service quality standards.” Nothing in the statute requires *the Commission* to mandate specific service quality metrics, as opposed to permitting *consumers* to determine the “reasonable” standards of service quality that providers must meet in order to be competitive. On the contrary, the Commission has “broad discretion” to implement the requirements of section 2896.³⁶ This is consistent with the legislative history of the statute³⁷ as well as the Commission’s inherent authority under section 701 to “do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction.” Relying on competition clearly falls within the Commission’s broad discretion.

Finally, section 451, which only DRA cites,³⁸ articulates a policy goal that is even more general than those found in the two prior statutes: every public utility must “furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” As before, section 451 does not dictate the means the Commission should use to achieve the goal. As previously discussed, reliance on competition is more effective at ensuring “reasonable service” that promotes the “safety, health, comfort, and convenience” of customers, and Section 451 does not say

³⁶ See Order Instituting Rulemaking on the Commission’s Own Motion to establish Consumer Rights and Protection Rules Applicable to All Telecommunications Utilities,” Decision No. 06-12-042, Rulemaking No. 00-02-004 (Dec. 14, 2006), at 27 (rejecting assertions by DRA and TURN that other portions of Section 2896 required the Commission to adopt “prescriptive rules” for information disclosure).

³⁷ See Senate Rules Committee Analysis Regarding Senate Floor Bill No. AB 726, hearing date July 16, 1993 (analysis provided by Senator Moore) (indicating Section 2896 sets forth “consumer protection principles, as opposed to mandating services, and thus the PUC maintain[s] flexibility to implement the principles.”)

³⁸ DRA Opening Comments at 2.

otherwise.³⁹ This statutory analysis shows that state and federal law and Commission precedent amply support the Scoping Memo's reliance on competition.

D. NO CLEAR NEED FOR COMMISSION-SPONSORED CUSTOMER SATISFACTION SURVEYS HAS BEEN ESTABLISHED.

As Verizon discussed in opening, there is no clear need for a Commission-sponsored service quality survey.⁴⁰ Verizon submits that the Commission will arrive at a similar conclusion by asking the following three questions: *First*, can a realistic purpose be clearly articulated as to how the Commission would utilize the survey results? *Second*, has the Commission confirmed that the stated purpose cannot be met with data from publicly available sources? *Third*, would the survey's benefits outweigh the economic, financial, and other costs of the survey? If the answer to any of these questions is "no," then Verizon recommends that the Commission not move forward with a survey.

As to the first question, as Mr. Fernandez stressed in his opening declaration, any survey must have a clearly articulated, realistic purpose and must be carefully designed to achieve that purpose.⁴¹ The two principal advocates of a Commission-sponsored survey—DRA and SureWest—articulate an unrealistic purpose: using the survey as an enforcement tool with which to identify service quality problems that require the Commission's attention.⁴² A customer satisfaction survey, however, should not be used for enforcement because the data collected is inherently subjective and

³⁹ Commission monitoring may be appropriate for certain *bona fide* safety issues that may not be fully addressed through market-oriented policies. The Commission, however, should guard against regulatory creep and should resist attempts to cast routine service quality metrics as safety issues. For example, DRA claims that among the "absolute minimum measures essential for consumer health and safety" are measures regarding call answer time and time to reach a life operator. DRA Comments at 7. Dr. Aron debunks that hyperbolic claim and provides a framework for identifying potential safety issues for which Commission monitoring may be appropriate. (Aron Reply Declaration at § VI. A.)

⁴⁰ Verizon Opening Comments at 13–15.

⁴¹ Fernandez Opening Declaration at ¶¶ 8–10.

⁴² See SureWest Opening Declaration at 5; DRA Opening Comments at 6. TURN and Disability Rights Advocates also express some support for surveys, although they do so cautiously and they emphasize the limitations of survey results. See TURN Opening Comments at 16–18; Disability Rights Advocates Opening Comments at 4–6.

the risk of “false positives,” i.e., situations where the data suggest a problem where one does not in fact exist, is too high.⁴³ In fact, with developing technologies, consumers’ perception of quality may actually *fall* as new technologies become more pervasive and consumer expectations increase—even though the actual quality of the service remains the same or increases.⁴⁴ Far better tools, including the complaint process, are available to the Commission for detecting concrete service quality problems that may require Commission action.⁴⁵

Another potential purpose for a customer satisfaction survey, which DRA mentions, might be to inform consumers about how competitors compare to each other. Here, the second question comes into play: are other sources of information already available for this purpose? The answer is yes. Californians already have numerous resources with which to make such decisions, including surveys from sources such as Consumer Reports and Consumers’ Checkbook, as well as Web sites that facilitate comparison shopping and information sharing.⁴⁶ DRA neither demonstrates a need for consumer education information from Commission surveys nor attempts to argue that the Commission could do a better job of supplying useful information than these market-driven sources.⁴⁷

Accordingly, the only realistic purpose for a Commission-sponsored survey would be a *policy* purpose, such as evaluating customer-satisfaction developments and trends as California’s market for voice communications continues to dramatically grow. But the policy usefulness of customer-satisfaction data, which is based on subjective perceptions, is limited. For example, as mentioned above, consumers’ perception of quality can significantly diverge from reality, and quality perceptions can

⁴³ Fernandez Opening Declaration at ¶¶ 33–35.

⁴⁴ Aron Opening Declaration at ¶ 79.

⁴⁵ Aron Opening Declaration at ¶ 33.

⁴⁶ *See generally* Aron Reply Declaration at § IV.F.

⁴⁷ DRA Opening Comments at 6–7 (stating only that the survey results should be made public but not discussing the other sources of information available to consumers).

even fall despite objective increase in quality.⁴⁸ This leaves the obvious question of what, if anything, the Commission might do with the results of a customer-satisfaction survey. Moreover, as previously discussed, the Commission can consult sophisticated publicly available surveys to learn about customer-satisfaction developments and compare providers.⁴⁹

Finally, as to the third question, if the Commission can articulate a realistic purpose for a customer satisfaction survey and determines that public sources do not adequately address that purpose, it must consider the costs of sponsoring a survey. Those include the important economic costs described by Dr. Aron as well as the financial and other costs described by Mr. Fernandez.⁵⁰ Verizon submits that any policy usefulness of a customer satisfaction survey would be outweighed by these costs.

The survey's costs would clearly be unacceptably high if the survey fails to follow the "best practices" that Mr. Fernandez describes.⁵¹ In particular, any survey should avoid seeking overly-detailed data about particular service attributes. Such a mistake could result in data of questionable accuracy that could not be compared across providers,⁵² and would significantly increase the potential anticompetitive impact of the survey.⁵³ Because of the importance of asking the right kinds of questions, Mr. Fernandez provides a list of questions appropriate for comparing providers and monitoring customer satisfaction trends.⁵⁴ *If* the Commission goes

⁴⁸ Aron Opening Declaration at ¶ 79. This, of course, is another reason why customer satisfaction surveys cannot be used for enforcement purposes.

⁴⁹ See, e.g., Verizon Opening Comments at 14; Joint Commenting Parties Opening Comments at 3-4; CTIA Opening Comments at 6-7; Verizon Wireless Opening Comments at 3-4.

⁵⁰ Aron Opening Declaration at § VII; Fernandez Reply Declaration at § V.

⁵¹ Fernandez Opening Declaration at ¶¶ 36-41.

⁵² Fernandez Opening Declaration at ¶¶ 26-28; 37; Fernandez Reply Declaration at ¶ 21.

⁵³ See generally Aron Opening Declaration at § VI (explaining that even simple monitoring can be anticompetitive by causing firms to improperly focus on the particular service attributes being monitored).

⁵⁴ Fernandez Reply Declaration, Ex. A.

forward with a service quality survey (which Verizon recommends against), it should follow best practices, including limiting the questions to the kind supplied by Mr. Fernandez.

AT&T suggests that the Commission use workshops to address the adequacy of existing third-party surveys and, if found to be inadequate, the means by which they could be supplemented by a Commission-sponsored survey.⁵⁵ Although Verizon does not believe a workshop is necessary at this time, if the Commission orders a workshop, Verizon urges the Commission to set forth clear goals and parameters before any workshop is held to ensure efficiency and productivity. The three questions Verizon addresses above, in addition to the best practices Mr. Fernandez discusses, provide a logical starting point for developing the goals and parameters of any workshop.

III. CONCLUSION

The time has come for the Commission to eliminate outdated, ILEC-centric service quality standards that limit innovation, distort the competitive process, and harm optimal, consumer-driven service quality. Verizon stands ready to work with the Commission and the parties toward that goal.

Dated: June 15, 2007

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⁵⁵ AT&T Opening Comments at 8.

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Ave., Ste. 300, San Francisco, CA 94102; I have this day served a copy of the foregoing:

**REPLY COMMENTS OF VERIZON CALIFORNIA INC. (U 1002 C)
AND ITS CERTIFICATED CALIFORNIA AFFILIATES ON MARCH 30, 2007
ASSIGNED COMMISSIONER RULING AND SCOPING MEMO**

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of June, 2007, at Thousand Oaks, California.

/s/Jacque Lopez

JACQUE LOPEZ

Service List:

R.02-12-004

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